

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR ADMISSIONS,
INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH CAROLINA
et al.,**

Defendants.

PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 34 and the Local Rules of the Middle District of North Carolina, Plaintiff Students for Fair Admissions, Inc. ("SFFA") requests that Defendants ("UNC") respond in writing and produce the documents described below within 30 days of service for inspection and copying at the offices of Consovoy McCarthy PLLC, 3033 Wilson Boulevard, Suite 700, Arlington, VA 22201, or at such other location to which the parties mutually agree.

INSTRUCTIONS

1. In responding to these document requests, You shall produce separately all documents in Your possession, custody or control, including documents in the possession, custody or control of Your agents and representatives.

48. All documents and communications regarding the Committee on Race-Neutral Strategies, referenced in UNC0079680, including, but not limited to, all documents concerning the committee's work, schedules, minutes, reports, or summaries of all committee and sub-committee meetings, the committee's final and draft reports, any communications regarding the decision to start the committee, and any communications between the committee members concerning the committee's work.

49. All drafts and the final version of the study by Abigail Panter and Charles Daye quantifying the educational benefits of diversity.

50. Final versions of any papers, studies, or formulas that You drafted or commissioned concerning "grit" (*e.g.*, UNC0108171), whether a two-reader system is necessary (*e.g.*, UNC0101747), the factors that lead to two readers disagreeing on the same application (*e.g.*, UNC0080095), how Advanced Placement courses or International Baccalaureate courses predict grade point averages at UNC (*e.g.*, UNC0083052), and the effect of legacy status on a student's chances of admission (*e.g.*, UNC0096777). If You already produced final versions of these papers or studies, please provide the Bates number for each final version.

51. All documents posted to the "Sakai" site for the Race Neutral Alternatives Working Group and the Committee on Race-Neutral Strategies or otherwise considered by those groups (*e.g.*, UNC0096592).

52. All drafts and final versions of the reading documents You use to train readers, such as those documents attached to the email located at UNC0099453.

53. All applicant, admission, and enrollment reports of the kind referenced by Jennifer Kretchmar at 148:18-149:7 of her deposition.

60. The reports, analyses, and studies of race-neutral alternatives that are discussed on pages 5-6 of Exhibit 12 to the deposition of Jennifer Kretchmar. If UNC has already produced these documents, please provide the documents' Bates numbers.

61. All reports, analyses, and studies of race-neutral alternatives to Your admissions process between 2002 and November 27, 2012 not otherwise included in Request 19 above.

62. All documents and communications by Your admissions officers concerning the implementation of race-neutral alternatives for university admissions in other States, including but not limited to universities in Florida, Texas, and California.

63. All documents upon which UNC is currently relying to satisfy its "burden of demonstrating, before turning to racial classifications, that available, workable race-neutral alternatives do not suffice." *Fisher v. Univ. of Texas at Austin*, 133 S. Ct. 2411, 2420 (2013). If UNC has already produced these documents, please provide the documents' Bates numbers.

Respectfully submitted this 20th day of March, 2017.

/s/

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